



October 27, 2008

Katharine London  
Executive Director  
Health Care Quality and Cost Council  
2 Boylston Street, 5<sup>th</sup> Floor  
Boston, MA 02116

Re: Reporting Plan of the Health Care Quality and Cost Council

Dear Ms. London:

On behalf of the Massachusetts Association of Health Plans (MAHP), I am writing in regard to the Health Care Quality and Cost Council's (Council) proposed reporting plan specifying the quality and cost measures to be included on the Council's consumer website, as required by the Health Reform Law (Chapter 58 of the Acts of 2006). We support the Council's proposed reporting plan and believe it to be a step in the right direction towards increased transparency of health care information.

MAHP and its member health plans have been strong supporters of transparency and the Council's mission to improve the quality of health care in the Commonwealth and reduce costs. Without basic information, improvements in the quality and cost of health care will not be possible. Controlling health care costs remains as the key issue surrounding the long-term sustainability of health reform and the Council's website is a critical component to helping us all get a handle on health care costs, drive quality improvement, and provide consumers with the data they need to make thoughtful and informed decisions about their care.

We believe the reporting plan, as outlined by the Council, is a good start and will enable consumers to begin to make decisions based on reliable information, and may serve to motivate the entire health care delivery system to begin making programmatic changes necessary to reducing costs and improving quality.

We would like to note one concern however, with respect to the proposal around publication of comparative cost information. The Council's Reporting Plan states that the website will not include comparative cost information if there are less than 10 hospitals with more than 30 discharges for a particular condition or procedure. Many hospitals do not perform some of the listed procedures, heart surgery and gastric bypass surgery are examples, and there may be only a few hospitals in the state that do. These are typically elective and reliably high-cost procedures; therefore comparative cost

information for these procedures ought to be included on the website irrespective of the number of hospitals conducting the procedures.

Following the launch of the initial website, it will be important to increase both the quantity of information and the level of specificity provided on the website to present a clear picture of the health care landscape in the Commonwealth. In addition to the information now included in the Council's Reporting Plan, we recommend adding information on the following procedures:

- Colonoscopy
- Hysterectomy
- Stress Tests
- Pulmonary Function Test
- Allergy Test
- Blood Test: Complete Metabolic Work-up
- Cholesterol Test

We understand that in the interest of time, the Council has utilized national and public organizations as sources of its quality data, and that the Council intends to hire an analytic consultant to assist with the development of additional measures and enable the Council to publish more in-depth comparisons among providers, including physicians. We strongly encourage the Council to move forward with this initiative to further expand the scope of the website.

We again applaud the efforts of the Council and would like to express our appreciation for the opportunity to share our feedback regarding this proposed reporting plan. We look forward to continuing to work with the Council to support its mission of increasing transparency and reducing health care costs. If you have any questions or need additional information, do not hesitate to contact me at 617-338-2244.

Sincerely,

Marylou Buyse, M.D.  
President